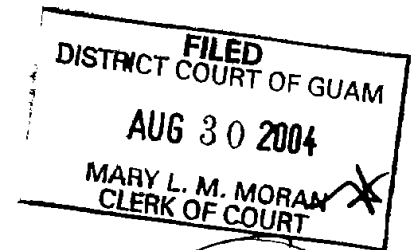


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DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**MOTION TO DISMISS PLAINTIFFS'
FIRST, THIRD, FOURTH, SIXTH AND
SEVENTH CAUSES OF ACTION**


Hongkong and Shanghai Banking Corporation, Ltd., ("HSBC") will move this Court to dismiss Plaintiffs' First, Third, Fourth, Sixth and Seventh Causes of Action of the Third Amended Complaint pursuant to FRCP 12(b)(6). The motion is supported by the Memorandum of Points and Authorities concurrently filed herein and the papers, records, and files in this

ORIGINAL

action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

EXECUTED on this 30th day of August 2004.

LAW OFFICES OF BRONZE & TANG
A Professional Corporation

By: 

JACQUES G. BRONZE
Attorneys for Defendant HSBC